

EXHIBIT OO



FOLEY & LARDNER LLP

ATTORNEYS AT LAW

ONE MARITIME PLAZA, SIXTH FLOOR
 SAN FRANCISCO, CA 94111-3409
 415.434.4484 TEL
 415.434.4507 FAX
 foley.com

June 30, 2008

CLIENT/MATTER NUMBER
 085437-3056 3080, 3081, 3083, 3094 and
 3097

VIA FACSIMILE AND U.S. MAIL

Andrea Laiacona
 Weinberg, Roger & Rosenfeld
 1001 Marina Village Parkway, Ste. 200
 Alameda, CA 94501-1091

Re: *SEIU v. Stanford Hospital & Clinics, et al.*
 U.S. Dist. Ct. Case Nos.: C-07-cv-5158, 5:08-cv-00213, 5:08-cv-00215, 5:08-cv-002216, 5:08-cv-01727 and 5:08-cv-01726

Dear Ms. Laiacona:

This will respond to your letter of June 26, 2008 regarding the above-referenced matters and the deposition of Kristy Sermersheim. Ms. Sermersheim, as you know, was the executive secretary of SEIU Local 715 and was involved (and gave testimony) regarding the SEIU International's activities concerning the reorganization of the local union entities – including Local 715. Moreover, Ms. Sermersheim is identified in a number of documents regarding this matter. Thus, Ms. Sermersheim not only has relevant information, her testimony goes to the heart of one of the issues being litigated in the case. Thus, we require her deposition to take place. Please provide us with available dates for this proceeding.

We further write to address Local 521's complete failure to properly respond to the subpoena issued to it and produce documents. We have received no documentation from this entity whatsoever. Please confirm that Local 521 will provide a proper response to the subpoena (as noted in Eileen Ridley's letter of June 9, 2008) and will produce documents this week. Failure of Local 521 to do so will result in a motion to compel being failed to obtain the discovery requested.

Very truly yours,

Scott P. Inciardi

cc: Eileen R. Ridley

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 SAN FRANCISCO, CA 94111-3409
 TELEPHONE: 415.434.4484
 FACSIMILE: 415.434.4507
 WWW.FOLEY.COM

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Andrea Laiacona Weinberg, Roger & Rosenfeld 1001 Marina Village Parkway, Ste. 200 Alameda, CA 94501-1091	5101.337.1001	510.337.1023

From : Scott P. Inciardi
Email Address : sinciardi@foley.com
Sender's Direct Dial : 415.984.9863
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 ONE MARITIME PLAZA, SIXTH FLOOR
 SAN FRANCISCO, CA 94111-3409
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